

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

POST OFFICE BOX SERVICE ENHANCEMENTS

Docket No. MC2012-26

**OPPOSITION OF THE UNITED STATES POSTAL SERVICE  
TO AMPC'S REQUEST FOR EXTENSION OF TIME TO FILE COMMENTS**

(July 20, 2012)

The United States Postal Service ("Postal Service") hereby opposes the July 19, 2012, motion of the Associated Mail and Parcel Centers, et al. ("AMPC"), which seeks a 30-day extension of the deadline for filing comments on the Postal Service's Response to Order No. 1366, filed on July 9, 2012 ("Response").

Pursuant to the Commission's instructions in Order No. 1366, that Response was filed according to the rules under 39 C.F.R. § 3020.30, and provided additional information about service enhancements introduced at certain Competitive Post Office Box locations.

In Order No. 1401, the Commission set July 31, 2012 as the deadline for filing responsive comments in this docket; a period of just over three weeks. According to 39 C.F.R. § 3001.16, extensions of time for making a filing may be granted by the presiding officer "upon motion for good cause shown." In its motion, AMPC states that an extension of thirty days is needed, because the owners of private mailbox providers "are extremely busy running their operations

on a daily basis,” and because “the extra time will allow these store owners to...write their comments and file those comments with the PRC.”<sup>1</sup> While the Postal Service understands that the owners of private mailbox businesses have priorities other than this proceeding, the Commission has already provided adequate time (just over three weeks) even under those conditions. In fact, as of July 19, 2012, twenty one private mailbox providers have already filed comments.<sup>2</sup> Consequently, the views and concerns of such small businesses have already been expressed in this docket, and the existing deadline allows for 11 more days for additional comments to be filed.<sup>3</sup>

Moreover, in its original Complaint, AMPC stated that “time is of the essence in this matter,”<sup>4</sup> and that the private mailbox providers “will be severely jeopardized”<sup>5</sup> by the Post Office Box enhancements. This emphatic request for expediency stands in stark contrast to the month-long extension that AMPC now requests. Indeed, when granting a fifteen day extension to answer the Postal Service’s Motion to Dismiss in Docket No. C2012-1, the Commission reminded AMPC “of the need going forward to more expeditiously coordinate the views of its multiple parties to ensure timely compliance with the required deadlines.”<sup>6</sup>

Though the Postal Service is sympathetic to the need to give small businesses

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<sup>1</sup> Docket No. MC2012-26, Request for Extension to Comment Deadline in MC2012-26 (July 19, 2012).

<sup>2</sup> While only 16 individual filings have been made by private mailbox providers, some of these filings were made on behalf of multiple private mailbox providers.

<sup>3</sup> It is worth pointing out that AMPC has a website dedicated to encouraging its members to submit comments in this docket ([www.fightformympc.com](http://www.fightformympc.com)). Given the numerous comments that have already been filed, and that are likely to be filed, these efforts have already borne fruit.

<sup>4</sup> Docket No. C2012-1, Complaint of the Associated Mail and Parcel Centers, et al., at 21 (March 15, 2012).

<sup>5</sup> *Id.* at 5.

<sup>6</sup> Docket No. C2012-1, Order No. 1315: Order Granting Request for Extension to Answer, at 2 (April 12, 2012).

an adequate amount of time to express their views, it does not believe that AMPC has shown “good cause” for the extraordinary extension it now requests.

Given the numerous comments that have already been filed in this docket and the ample amount of time remaining before the current deadline expires, the Postal Service respectfully requests that the Commission deny AMPC’s request for an extension. The Postal Service believes that this action comports with the previously expressed desire of all parties; that the matters at issue in this docket be resolved as quickly as possible.

Respectfully submitted,

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